

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
V.)
)
KALEEM AHMAD,)
Defendant)
_____)

CRIMINAL NO. 16-cr-10006-WGY

**Assented-to Motion to Continue Sentencing Hearing and Extend Time to File
Objections to PSR**

Defendant, Kaleem Ahmad, requests a continuance of the sentencing hearing in this matter, currently scheduled for September 9, 2016, and a corresponding extension of time to file objections to the Presentence Report (“PSR”). As grounds, counsel for the defendant needs additional time to prepare for sentencing. In support, counsel for the defendant states as follows:

To date, the government has calculated, and probation has adopted, an \$11 million loss calculation attributable to the defendant. On August 2, 2016, three days before the disclosure of the Presentence Report, the government advised the defendants of new information that, according to the government, “will increase substantially” the tax loss calculation. The government also advised that it was going to try to complete the new tax loss calculation before the end of the month.

Due to time constraints resulting from the press of other cases and scheduled vacation days in August, counsel for the defendant would need additional time to prepare for sentencing even in the absence of the new government disclosures. In light of the government’s recent disclosures, counsel for the defendant will need additional time to

do the following: 1) analyze the new loss calculation once it is finalized; 2) consider discovery requests for documentation supporting the government's new loss calculation; and 3) prepare for a potential contested hearing on the government's loss calculation.

Assistant U.S. Attorney Stephen Heymann assents to this continuance request but will object to any further requests for a continuance.

For the reasons stated above, the defendant respectfully requests a continuance of the sentencing hearing to October 18, 2016, and a corresponding extension of time to file objections to the PSR to September 27, 2016 (21 days prior to sentencing).

Respectfully Submitted,
Kaleem Ahmad
By His Attorney

/s/ William H. Connolly
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Certificate of Service

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as non registered participants on August 18, 2016.

/s/ William H. Connolly